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5 Rainbow K Jewelry SAS

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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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11 Susan Oster d/b/a/ Feral Jewelry, an  
12 individual,

13 Plaintiff,

14 v.

15 Rainbow K Jewelry SAS, a French  
joint-stock company; mytheresa.com  
16 GmbH, a German entity; Schoola, Inc.  
d/b/a/ Olivela.com, a Delaware  
17 corporation; SoPicks, an Italian entity;  
Eastward Bound Technology, Inc.  
18 d/b/a/ Vugstyle, Inc., a Colorado  
corporation; Last Resort, LLC, a  
19 California company; and DOES 1-50,  
inclusive,

20 Defendants.  
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Case No. 2:25-cv-04929 JLS (PDx)

Judge: Hon. Josephine L. Staton

**DEFENDANT RAINBOW K  
JEWELRY SAS' EX PARTE  
APPLICATION FOR EXTENSION  
OF TIME TO RESPOND TO  
COMPLAINT**

*[Filed concurrently with Memorandum  
of Points and Authorities, Declaration  
of P. Branko Pejic, and (Proposed)  
Order]*

22 **TO THE HONORABLE COURT, AND TO PLAINTIFF AND HER**  
23 **ATTORNEYS OF RECORD:**

24 **PLEASE TAKE NOTICE** that Defendant Rainbow K Jewelry SAS  
25 (“Defendant” or “Rainbow”) hereby applies *ex parte* for an extension of time to  
26 respond to the Complaint of Plaintiff Susan Oster d/b/a/ Feral Jewelry (“Plaintiff” or  
27 “Oster”).

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1 This *ex parte* application follows a failed attempt to enter into a stipulation  
2 with counsel for an extension of time to respond to Plaintiff's Complaint, pursuant  
3 to Local Rule 8 and Defendant has provided notice of this application, pursuant to  
4 the Local Rules and this Court's Standing Order.

5 Rainbow's request for relief is based on this application, the accompanying  
6 Memorandum of Points and Authorities, the Declaration of P. Branko Pejic, and the  
7 Exhibits thereto, the Complaint filed by Plaintiff in this action, and any other  
8 argument or information that may be presented prior to the Court's decision on this  
9 application.

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11 Dated: June 24, 2025

BURKE, WILLIAMS & SORESENSEN, LLP

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13 By: s/ Edith Sanchez Shea

14 Edith Sanchez Shea  
15 Attorneys for Defendant  
16 Rainbow K Jewelry SAS  
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